

VIA CM/ECF FILING

September 12, 2022

The Honorable James Donato
San Francisco Courthouse, U.S. District Court
Courtroom 11 – 19th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Joint Statement Regarding Selection of Settlement Neutral
Maximilian Klein et al. v. Meta Platforms, Inc., Case No. 3:20-cv-08570-JD (N.D. Cal.)

Dear Judge Donato:

Pursuant to the Court's instructions during the Court's August 11, 2022 case management conference and the Court's subsequent orders following that conference (Dkts. 334, 342, 352), Consumer Plaintiffs, Advertiser Plaintiffs, and Defendant Meta Platforms, Inc. write to update the Court that they have agreed to designate Gregory P. Lindstrom as mediator, with separate mediation sessions for Consumer Plaintiffs and for Advertiser Plaintiffs.

DATED: September 12, 2022

By /s/ Yavar Bathaee

BATHAEE DUNNE LLP

Yavar Bathaee (Bar No. 282388)
yavar@bathaeedunne.com
Andrew C. Wolinsky
awolinsky@bathaeedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
Telephone: (332) 322-8835

Brian J. Dunne (Bar No. 275689)

bdunne@bathaeedunne.com

Edward M. Grauman (*pro hac vice*)
egrauman@bathaeedunne.com
901 South MoPac Expressway
Plaza I, Suite 300
Austin, TX 78746
Telephone: (512) 575-8848

By /s/ Amanda F. Lawrence

**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**

Amanda F. Lawrence (*pro hac vice*)
alawrence@scott-scott.com
Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (*pro hac vice*)
msradoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Telephone: (860) 537-5537

Patrick J. Rodriguez (*pro hac vice*)

prodriquez@scott-scott.com

230 Park Avenue, 17th Floor
New York, NY 10169
Telephone: (212) 223-6444

Christopher M. Burke (Bar No. 214799)

cburke@scott-scott.com

David H. Goldberger (Bar No. 225869)
dgoldberger@scott-scott.com

Hal D. Cunningham (Bar No. 243048)
hcunningham@scott-scott.com

Respectfully submitted,

By /s/ Stephen A. Swedlow

**QUINN EMANUEL URQUHART & SULLIVAN,
LLP**

Stephen A. Swedlow (*pro hac vice*)
stephenswedlow@quinnemanuel.com
Michelle Schmit
michelleschmit@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400

Kevin Y. Teruya (Bar No. 235916)

kevinteruya@quinnemanuel.com

Adam B. Wolfson (Bar No. 262125)
adamwolfson@quinnemanuel.com

Brantley I. Pepperman (Bar No. 322057)
brantleypepperman@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000

Manisha M. Sheth (*pro hac vice*)

manishasheth@quinnemanuel.com

51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000

By /s/ Shana E. Scarlett

HAGENS BERMAN SOBOL SHAPIRO LLP

Shana E. Scarlett (Bar No. 217895)
shanas@hbsslaw.com

715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000

Steve W. Berman (*pro hac vice*)

steve@hbsslaw.com

1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292

Daniel J. Brockwell (Bar No. 335983)
dbrockwell@scott-scott.com
Yifan (Kate) Lv (Bar No. 302704)
klv@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 233-4565

LEVIN SEDRAN & BERMAN LLP
Keith J. Verrier (*pro hac vice*)
kverrier@lfsblaw.com
Austin B. Cohen (*pro hac vice*)
acohen@lfsblaw.com
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: (215) 592-1500

AHDOOT & WOLFSON, PC
Tina Wolfson (Bar No. 174806)
twolfson@ahdootwolfson.com
Robert Ahdoot (Bar No. 172098)
rahdoot@ahdootwolfson.com
Theodore W. Maya (Bar No. 223242)
tmaya@ahdootwolfson.com
Henry Kelston (*pro hac vice*)
hkelston@ahdootwolfson.com
2600 West Olive Avenue, Suite 500
Burbank, CA 91505
Telephone: (310) 474-9111

Interim Counsel for the Advertiser Class

LOCKRIDGE GRINDAL NAUEN P.L.L.P.
W. Joseph Bruckner (*pro hac vice*)
wjbruckner@locklaw.com
Robert K. Shelquist (*pro hac vice*)
rkshelquist@locklaw.com
Brian D. Clark (*pro hac vice*)
bdclark@locklaw.com
Rebecca A. Peterson (Bar No. 241858)
rapeterson@locklaw.com
Arielle S. Wagner (*pro hac vice*)
aswagner@locklaw.com
Kyle J. Pozan (admitted *pro hac vice*)
kjpozan@locklaw.com
Laura M. Matson (admitted *pro hac vice*)
lmmatson@locklaw.com
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900

Interim Counsel for the Consumer Class

By: /s/ Sonal N. Mehta
WILMER CUTLER PICKERING HALE AND DORR LLP
SONAL N. MEHTA (Bar No. 222086)
Sonal.Mehta@wilmerhale.com
2600 El Camino Real, Suite 400
Palo Alto, California 94306
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)
David.Gringer@wilmerhale.com
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800

ARI HOLTZBLATT (*pro hac vice*)
Ari.Holtzblatt@wilmerhale.com
MOLLY M. JENNINGS (*pro hac vice*)
Molly.Jennings@wilmerhale.com
1875 Pennsylvania Ave NW
Washington, DC 20006
Telephone: (202) 663-6000

Attorneys for Defendant Meta Platforms, Inc.

ATTESTATION OF STEPHEN A. SWEDLOW

This document is being filed through the Electronic Case Filing (ECF) system by attorney Stephen A. Swedlow. By his signature, Mr. Swedlow attests that he has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: September 12, 2022

By: */s/ Stephen A. Swedlow*
Stephen A. Swedlow

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September 2022, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing the document to be electronically served on all attorneys of record.

Dated: September 12, 2022

By: */s/ Stephen A. Swedlow*
Stephen A. Swedlow